

EXHIBIT

B

From: [Myrna Perez](#)
To: [Colmenero, Angela](#); [Ezra Rosenberg](#); [Dellheim, Richard \(CRT\)](#); [Freeman, Daniel \(CRT\)](#); alltexasvoterid@dechert.com
Cc: [Frederick, Matthew](#)
Subject: Re: Veasey v. Abbott -- Education Materials
Date: Monday, June 26, 2017 9:54:44 AM

Angela,

We have numerous comments on the documents you sent at approximately 6 pm on Friday. Before we get into those documents, we have two overarching objections.

1. **The materials SHOULD NOT include any description of SB 5.** The legislation has not been approved by the Court, does not cure the discriminatory effect, and is an extension of SB 14's discriminatory intent. Any mention of SB 5 in these educational materials is misleading, confusing, and in contempt of the Court's order. We would find acceptable an understated statement early on in the materials like: In case you have heard that the legislature passed another version of photo ID law, know that it has not been approved by the Court and therefore will not be covered in these materials at this time.
2. **The time we were given to review and comment on these materials was insufficient and unreasonable.** Informing us late on Friday, with no advance warning to expect it, and giving us a deadline of Monday at 10 AM CST to review approximately 150 pages does not comport with your meet and confer obligations, and lacks collegiality. The State knows it has trainings coming up and it knows it has printing deadlines and should have planned in a way that allowed us more time to examine the documents. The circumstance we find ourselves in makes it exceedingly difficult to presume good faith on the part of the State. Given the time crunch you unnecessarily imposed upon us, we cannot be certain that the comments below are exhaustive and we retain our right to object further. Moreover, we are only commenting on the portions of the material that relate to the photo ID law.

Reiterating the above, we would further add:

Re: the In Person Voting Presentation:

Pg 27: Language is confusing and misleading. It must provide more guidance that having an accepted ID once does not mean that an eligible voter is foreclosed from having a reasonable impediment now to obtaining an ID.

Pg 28: Language is confusing and misleading. It must be revised to account for an eligible voter not understanding how they are supposed to answer when they cannot reasonably obtain an accepted ID.

Pg 31: Language in the note is confusing and misleading. It must be revised to be more understandable as to the given example and circumstances that may qualify as a reasonable impediment.

Pg 36: Language is confusing and misleading. The standard is that a person cannot reasonably obtain an accepted photo ID.

Pg 37: Language is confusing and misleading. It must be revised to account for an eligible voter not understanding how they are supposed to answer when they cannot reasonably obtain an accepted ID.

Pg 72: Language is confusing and misleading. It must be revised so that pollworkers and voters understand the process for curing a provisional ballot.

Pg 73: Policy description is nonsensical. A person who discovered that they cannot reasonably obtain an accepted ID during the cure period should be able to provide supporting identification and complete a reasonable impediment declaration. In fact, one of the acceptable grounds for a reasonable impediment declarations is: photo ID applied for but not received. Denying the option to persons who believed they could get an ID in time, but turned out to be mistaken, undermines the purpose of the reasonable impediment declaration.

Re: the Election Law Calendar

Pg 2: Bolded language is confusing and misleading. The standard is that a person cannot reasonably obtain an accepted photo ID.

Pg 3: Language is confusing and misleading. The standard is that a person cannot reasonably obtain an accepted photo ID.

From: Colmenero, Angela <Angela.Colmenero@oag.texas.gov>

Sent: Friday, June 23, 2017 5:55 PM

To: Ezra Rosenberg; Dellheim, Richard (CRT); Freeman, Daniel (CRT); alltexasvoterid@dechert.com

Cc: Frederick, Matthew

Subject: RE: Veasey v. Abbott -- Education Materials

Please use this version of the "In Person Voting Presentation." The version attached to the prior email was missing pages.

Thanks,
Angela

From: Colmenero, Angela

Sent: Friday, June 23, 2017 4:46 PM

To: Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Dellheim, Richard (CRT) <Richard.Dellheim@usdoj.gov>; 'Freeman, Daniel (CRT)' <Daniel.Freeman@usdoj.gov>; alltexasvoterid@dechert.com
Cc: Frederick, Matthew <Matthew.Frederick@oag.texas.gov>
Subject: Veasey v. Abbott -- Education Materials

Based on the Court's order on the motions to enforce (ECF No. 943), Defendants have attached draft materials which will be published for the upcoming election official training seminar in July. SOS will be sending the materials to the printer on Monday, June 26. As a result, we need any comments from the Plaintiffs no later than **10:00 a.m. CST on Monday, June 26.**

Thanks,
Angela

Angela V. Colmenero
Chief, General Litigation Division
Office of the Attorney General
512.475.4100 (direct)